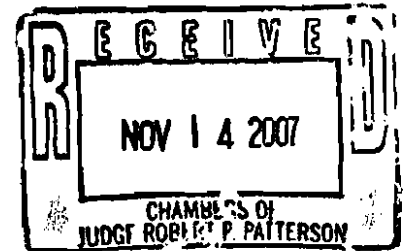


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November 14, 2007

Via Telecopy (212-805-7917)

Honorable Robert P. Patterson  
U. S. District Court  
Southern District of New York  
500 Pearl St., Room 2550  
New York, NY 10007

**MEMO ENDORSED**

Re: *Cadence Innovation LLC v. Delphi Corporation, et al. (In re Delphi Corporation, et al.), 07-cv-08769 (Motion Seeking Mandatory Withdrawal of the Reference)*

Dear Judge Patterson:

On October 8, 2007, Cadence Innovation LLC ("Cadence"), filed a motion for mandatory withdrawal of the reference of certain estimation proceedings initiated by Delphi Corporation and its affiliates ("Delphi") in the bankruptcy cases currently pending before Judge Robert D. Drain (United States Bankruptcy Court for the Southern District of New York – Case No. 05-44481 (RDD)). That matter has been transmitted to this Court for determination and assigned Case No. 07-cv-08769. Delphi's request for estimation involved a patent claim asserted by Cadence which is presently pending before the United States District Court for the Eastern District of Michigan.

The parties have been discussing the substantive issues (as well as the issues relating to the process of estimation) and have reached tentative agreement relative to the allowance of a claim (or claims) in the bankruptcy cases. The parties are currently working on the documentation of that resolution and expect to be able to present that resolution to Bankruptcy Judge Drain by the end of November. Accordingly, I have spoken with counsel for Delphi and we have concluded that the most efficient way to address the currently-pending motion to withdraw the reference is for the Court to defer any consideration of the motion pending the approval of the resolution of the underlying dispute by Bankruptcy Judge Drain. If the parties are unable to reach final documentation and resolution or if the Bankruptcy Court does not approve the proposed resolution, the parties can then advise this Court of that eventuality and seek guidance from the Court as to the appropriate way to proceed with matters at that point in time.

*In view of the pending settlement of the dispute, this court will hold in abeyance action re Delphi's Cadence's motion for a mandatory withdrawal of the reference until 12/4/07. so ordered*  
11/16/07 *Robert P. Patterson* USA 2

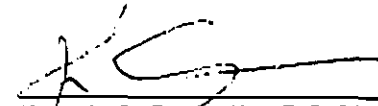
Honorable Robert F. Patterson  
November 14, 2007  
Page 2

Please note that I am sending a copy of this letter to counsel for Delphi (Mr. John Lyons at Skadden Arps). If the Court requires a motion or something more formal than this letter, I will be happy to take whatever action the Court direct.

Respectfully submitted,

ALSTON & BIRD LLP

By:



Dennis J. Connolly (DC-9932)

Attorney for Cadence Innovation LLC

DJC:br

cc: John Lyons, Esq. (w/encl., via telecopy and email)